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DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

ELIZABETH A. MCGEARY

DIRECT DIAL 202-776-2672
emcgeary@dlalaw.com

WASHINGTON, D.C.

1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

July 8, 1997

RECEIVED

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Attention: Policy and Rules Division
Stop Code 1800D

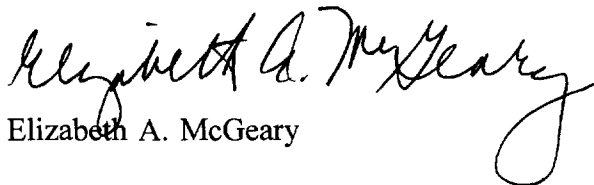
Re: MM Docket Nos. 91-221, 87-8, 94-150, and 87-154
Television Station WUAB(TV), Lorain, Ohio

Dear Mr. Caton:

On behalf of Cannell Cleveland, L.P., the licensee of Television Station WUAB(TV), Lorain, Ohio, we submit herewith an original and four copies of the licensee's response to the FCC's June 17, 1997 Public Notice in the above-captioned proceedings. This submission concerns a Time Brokerage Agreement between Cannell Cleveland, L.P. and Malrite Communications Group, Inc., licensee of Television Station WOIO(TV), Shaker Heights, Ohio.

Should any questions arise concerning this matter, kindly contact the undersigned.

Respectfully submitted,


Elizabeth A. McGeary

Enclosure

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LMA REPLY FORM

MARKET: CLEVELAND, OH

DMA # 13

					Degree of Overlap (%)			Nielsen (all day) Audience Share (9am - midnight)		
					City Grade	Grade A	Grade B	11/96	2/97	5/97
Brokered Station:	Channel 43 WUAB(TV)	UPN	Lorain/ Cleveland, Ohio	Cannell Cleveland, L.P.	100%	100%	100%	9.5	9.9	10.2
Brokering Station:	Channel 19 WOIO(TV)	CBS	Shaker Heights, Ohio	Malrite Communica- tions Group, Inc.				7.2	6.9	9.9

LMA Specifics:	Date of LMA <u>Signing</u>	Length of <u>Initial Term</u>	Initial Term <u>Start Date</u>	Initial Term <u>End Date</u>	<u>Renewal Provisions/Terms</u> Describe renewal provisions including: (1) length of renewal, (2) at which party's option, (3) whether renewal may be exercised.	% Time Brokered <u>per week</u>
	5/3/94	10 years	8/18/94	8/18/04	(1) 2 additional 5 year terms (2) at Programmer's discretion (3) notice must be delivered to Licensee no later than 90 days prior to expiration of then existing term	98%

PUBLIC INTEREST BENEFITS RESULTING FROM ENTERING INTO THE LMA

The Time Brokerage Agreement ("TBA") between Malrite Communications Group, Inc. ("Malrite") and Cannell Cleveland, L.P. ("Cannell") has had a number of public interest benefits as detailed below.

The TBA has permitted both stations to streamline and economize their operations. Prior to the TBA, the stations had separate studios and offices. The stations have since collocated their facilities in a new studio located in downtown Cleveland, accessible to residents of Cleveland and the residents of each station's community of license. The collocation has allowed the stations to save on rental, utility and maintenance costs and to upgrade technical equipment and facilities as necessary. Administrative functions have to some degree been combined resulting in overall operational efficiencies.

The cost savings both stations have realized have translated into enhanced public affairs, news and entertainment programming including expanded coverage and specials relating to local parades, the opening of the Rock & Roll Hall of Fame, various Cleveland Indians Baseball Specials, New Years Eve Live from Public Square, specials focusing on children, children's health care needs and spotlights on local artists and musicians. Prior to the TBA, WUAB aired a one-hour local newscast each day. WOIO, however, carried no local news programming at that time. Since the stations began operating under the TBA, WUAB has continued to air an hour-long newscast Monday-Sunday and WOIO(TV) now airs one and one-half hours of local news during the week and one hour of news on Saturday and Sunday. In addition to their news programs, each station also airs at least one hour of locally-produced public affairs programs addressing the needs and concerns of their communities of license and the greater Cleveland area. The stations collaborate on news and public affairs specials, including specials designed to educate children, and work together to promote local community events. In summary, under the TBA, these stations have been able to expand their efforts to serve the public through local news and public affairs, and achieve economies of scale that have resulted in more efficient operations.